

**REMARKS**

Applicants respectfully request favorable reconsideration and allowance of the present application in view of the foregoing amendments and the following remarks.

Claims 1-20 are pending in the present application. Claims 1, 7, and 13-20 are the independent claims.

Claim 19 has been amended. Claim 20 is newly-presented. No new matter is believed to have been added.

Initially, Applicants acknowledge with appreciation the indication that claims 1-18 are allowed. By the present Amendment, Applicants have not amended any of allowed claims 1-18. Thus, it is respectfully submitted that claims 1-18 remain in condition for allowance.

Claim 19 was rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 4,527,101 (Zavis et al.). This rejection is respectfully traversed.

Independent claim 19 recites, inter alia, a motor controller for controlling a movable member mechanically connected to a motor ... , comprising ...an encoder configured to detect at least one of a rotational position and a velocity of the motor and to generate the analog feedback signals.

However, Applicant respectfully submits that Zavis et al. does not teach or suggest at least the aforementioned features of independent claim 19.

Zavis et al. relates to universal electric motor speed sensing using a Fourier transform method and discusses an arrangement including resistive element  $R_s$  in series with a motor M so that a voltage potential  $V_m$  develops across the resistor  $R_s$  during rotation of the motor, an amplifier and filter 12 which amplifies and filters the voltage  $V_m$  and outputs a filtered analog signal, an analog-to-digital converter 16 which converts the filtered analog signal and outputs a digital signal to a microprocessor 18 which evaluates the input digital signal and outputs present motor speed information to a motor controller 24. The motor speed information is then used to effect motor control. (Zavis et al., Col. 4, lines 3-55). However, Zavis et al. is silent as to controlling a movable member. Thus, Zavis et al. does not teach at least the aforementioned features of independent claim 19.

Accordingly, favorable reconsideration and withdrawal of the rejection of independent claim 19 under 35 U.S.C. § 102 are respectfully requested.

It is respectfully submitted that newly-presented independent claim 20 also patentably defines over the citations of record at least for reasons similar to those set forth above regarding

independent claim 19.


Applicants believe that the present Amendment is responsive to each of the points raised by the Examiner in the Official Action and submits that the application is in allowable form. Favorable consideration of the claims and passage to issue of the patent application at the Examiner's earliest convenience earnestly are solicited.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

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